

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SLATER BRENNAN, Individually and on Behalf
of All Others Similarly Situated,

Plaintiff,

v.

LATCH, INC. f/k/a TS INNOVATION
ACQUISITIONS CORP., LUKE
SCHOENFELDER, GARTH MITCHELL, and
BARRY SCHAFFER,

Defendants.

Case No.: 1:22-cv-07473 (JGK) (GWG)

**JOINT STIPULATION AND ~~PROPOSED~~ ORDER REGARDING SERVICE OF THE
COMPLAINT AS TO THE INDIVIDUAL DEFENDANTS**

Plaintiff Slater Brennan (“Plaintiff”) and Defendants Luke Schoenfelder, Garth Mitchell, and Barry Schaffer (collectively, the “Individual Defendants”) hereby stipulate and agree as follows:

WHEREAS, on August 31, 2022, Plaintiff filed a class action complaint against the Individual Defendants and Defendant Latch, Inc. f/k/a TS Innovation Acquisitions Corp. (“Latch”) captioned *Brennan v. Latch Inc. f/k/a TS Innovation Acquisitions Corp.*, No. 1:22-cv-07473 (JGK) (the “Complaint,” ECF No. 1), pursuant to Sections 10(b) and 20(a) of the Securities Exchange Act of 1934, as amended by the Private Securities Litigation Reform Act (the “PSLRA”), 15 U.S.C. § 78u-4;

WHEREAS, Defendant Latch was served with the summons and Complaint on September 20, 2022 (ECF No. 5);

WHEREAS, the Court granted a stipulation providing that, within 14 days of an order appointing lead plaintiff and approving lead counsel pursuant to the PSLRA, lead counsel and counsel for Latch shall meet and confer and submit a proposed schedule for filing an amended complaint and for Latch’s response thereto (ECF No. 27);

WHEREAS, the undersigned parties agree that, in the interests of efficiency and conservation of resources, Individual Defendants also need not respond to the Complaint, as it will be superseded by the Lead Plaintiff’s amended complaint; and

WHEREAS, Plaintiffs and Defendant Latch have made one previous request for an extension, which was so ordered by the Court (ECF No. 27), but this is the Individual Defendants’ first request for an extension;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and among the undersigned counsel, and subject to the Court’s approval, that:

1. Undersigned counsel for the Individual Defendants hereby accept service of the summons and Complaint on behalf of Defendants Luke Schoenfelder, Garth Mitchell, and Barry Schaffer, without waiver of any defenses, objections or arguments, except as to sufficiency of service of process.

2. The Individual Defendants also need not respond to the Complaint.

3. Consistent with the previously ordered stipulation between Plaintiff and Defendant Latch, within fourteen days of entry of an Order appointing lead plaintiff and approving lead counsel, Lead Counsel and counsel for Latch and the Individual Defendants shall meet and confer and submit a proposed schedule for the filing of an amended complaint and for Individual Defendants' response thereto.

IT IS SO STIPULATED AND AGREED TO THIS 5th DAY OF JANUARY, 2023.

GLANCY PRONGAY & MURRAY LLP¹

By: /s/ Gregory B. Linkh
Gregory B. Linkh
230 Park Ave., Suite 358
New York, NY 10169
Telephone: 212-682-5340
Facsimile: 212-884-0988
Email: glinkh@glancylaw.com

Robert V. Prongay
Charles H. Linehan
Pavithra Rajesh
1925 Century Park East, Suite 2100
Los Angeles, CA 90067
Telephone: 310-201-9150
Facsimile: 310-201-9160

THE LAW OFFICES OF FRANK R. CRUZ

¹ Per Southern District of New York Electronic Case Filing Rules & Instructions, Filing Rule 8.5, counsel for Slater Brennan consents to electronic signature.

Frank R. Cruz
1999 Avenue of the Stars, Suite 1100
Los Angeles, CA 90067
Telephone: 310-914-5007

Attorneys for Plaintiff Slater Brennan

LATHAM & WATKINS LLP²

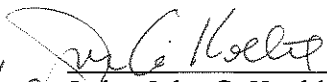
By: /s/ Adam Shamah
Adam Shamah
1271 Avenue of the Americas
New York, NY 10020
Telephone: 212-906-1200
Email: adam.shamah@lw.com

Michele D. Johnson (*pro hac vice* forthcoming)
Kristin N. Murphy (*pro hac vice* forthcoming)
650 Town Center Drive, 20th Floor
Costa Mesa, CA 92626-1925
Telephone: 714-755-1235
Email: michele.johnson@lw.com
kristin.murphy@lw.com

Colleen C. Smith (*pro hac vice* forthcoming)
12670 High Bluff Drive
San Diego, CA 92130
Telephone: 858-523-5400
Email: colleen.smith@lw.com

*Attorneys for Defendants Latch, Inc. f/k/a TS
Innovation Acquisitions Corp., Luke Schoenfelder,
Garth Mitchell, and Barry Schaeffer*

SO ORDERED:

1/6/23  _____, U.S.D.J.
Judge John G. Koeltl

² Per Southern District of New York Electronic Case Filing Rules & Instructions, Filing Rule 8.5, counsel for Latch, Inc. f/k/a TS Innovation Acquisitions Corp., Luke Schoenfelder, Garth Mitchell, and Barry Schaeffer consents to electronic signature.